

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Special Agent Cyril Pereira, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (the “ATF”). I am empowered to investigate and make arrests for the offenses set forth in 18 U.S.C. § 2516. As such, I am an “Investigative or law enforcement officer” within the meaning of 18 U.S.C. § 2510(7).
2. I previously worked as a Customs and Border Protection Officer assigned to the Tactical Terrorism Response Team at John F. Kennedy International Airport from 2011 to 2018. My duties included, but were not limited to, coordinating efforts with the Joint Terrorism Task Force to conduct interviews of terror suspects, and known members of the Terrorist Watchlist as they traveled internationally.
3. I am currently assigned to the ATF Puerto Rico Group II Field Office in the Miami Field Division and have been so employed since October 2018. As a Special Agent with the ATF, I conduct criminal investigations concerning the alleged violations of Federal laws and violent crimes. In this capacity, I have been involved in the investigations of multiple cases. Through training, investigations, and experience, I have taken part in cases relating to the trafficking of firearms, the use and possession of firearms by persons prohibited by law, and the possession of illegal firearms. I am familiar and have participated in various methods of investigations, including, but not limited to: electronic surveillance, physical surveillance, interviewing and general questioning of witnesses, use of confidential informants, use of cooperating witnesses, and use of toll records and subscribers’ information. I possess a bachelor’s degree in Criminal Justice and a master’s degree in Public Administration.
4. The details and information stated herein are based on my training, experience, and personal

knowledge and compilation of facts and events investigated by me and other Law Enforcement Officers who investigated and confirmed their veracity or oversaw their development. I have drafted this affidavit for the limited purpose of establishing probable cause that Jacksel CRUZ-PIZARRO violated Title 18, United States Code, Section 922(g)(1) (possession of a firearm by a convicted felon), Title 18, United States Code, Section 924 (c) (possession of a firearm in furtherance of a drug trafficking crime, and Title 21, United States Code, Section 841(a)(1) (Possession with intent to distribute controlled substance). Therefore, I have not included all the facts of this investigation.

#### **FACTS SUPPORTING PROBABLE CAUSE**

5. On the morning of February 25, 2025, the Puerto Rico Police Bureau (PRPB) contacted the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), regarding the arrest of Jacksel CRUZ-PIZARRO.
6. According to the PRPB, on February 7, 2025, the PRPB received an anonymous tip that individuals at Villa Canona, Street # A, House 8, Loiza, PR (herein referred to as “the residence”) were engaged in illegal firearms and drug activity. On the same day, PRPB conducted surveillance, to locate the residence, which they did successfully. PRPB described the residence as a bilevel concrete structure, pink and blue in color, with a wooden front-door.
7. On February 13, 2025, PRPB Agents, while on surveillance near the residence, observed an individual, later identified as Jacksel CRUZ-PIZARRO, with a firearm in his waistband and smoking suspected marijuana. CRUZ-PIZARRO was then seen entering the residence.
8. On February 18, 2025, PRPB Agents, while on surveillance near the residence, observed an unidentified individual who was standing near the residence. CRUZ-PIZARRO was then observed conducting what appeared to be a narcotics transaction in front of the residence and

returning to the residence with the money he received from the unidentified individual.

9. On February 19, 2025, PRPB Agents, while on surveillance near the residence, observed an unidentified individual with a pistol in his waist band enter the residence with CRUZ-PIZARRO. PRPB Agents also observed what appeared to be another narcotics transaction being conducted by CRUZ-PIZARRO in front of the residence. CRUZ-PIZARRO was observed returning to the residence after conducting the narcotics transaction.

10. On February 25, 2025, the PRPB executed a state search warrant on the residence. Present were CRUZ-PIZARRO and an individual he identified as his uncle Jose F. Carrasquillo. The PRPB ultimately seized:

- One .40 Caliber Glock 23 pistol bearing serial number DXF688US
- One 7.62 x 39mm Romarm Cugir Draco pistol bearing serial number DA206712RO
- Three hundred and fifty-seven rounds of ammunition
- Fourteen firearm magazines
- Six plastic containers with suspected Marijuana inside
- Four plastic bags containing suspected Marijuana.
- One plastic pill container with six (6) suspected Tramadol pills
- Eight hundred and one dollars (\$801.00)
- Two Cellular Phones



11. CRUZ-PIZARRO was subsequently arrested and transported to the PRPB Drogas Metro Headquarters in Guaynabo, Puerto Rico. CRUZ-PIZARRO was mirandized by the PRPB and refused to be interviewed by them. After the decision was made for the case to be adopted federally, the ATF mirandized CRUZ- PIZARRO again. CRUZ-PIZARRO initially refused to speak with ATF but moments later he requested to make a statement. ATF mirandized CRUZ-PIZARRO again and he explained that all the evidence seized from the residence was his. He then refused to say anything further.

12. The suspected marihuana seized from CRUZ-PIZARRO was field-tested, and it was positive for marihuana.

13. ATF conducted a preliminary function test on both seized firearms. The Romarm Cugir Draco Pistol tested positive, indicating that this firearm may be capable of firing more than one round of ammunition with the single function of a trigger. The Glock 23 Pistol was reported stolen in 2010 out of the state of Florida.

14. The investigation revealed that no firearms or ammunition are commercially manufactured

in the commonwealth of Puerto Rico. Therefore, the aforementioned firearms and ammunition were shipped or transported in interstate or foreign commerce.

15. According to court documents, CRUZ-PIZARRO was convicted in 2020 in criminal case 19-501 (ADC) of a crime punishable by imprisonment for a term exceeding one year and at the time of the instant offense was on supervised release.

### **CONCLUSION**

16. Based on the above facts, I respectfully submit there is probable cause to believe that Jacksel CRUZ-PIZARRO violated 18 U.S.C § 922(g)(1) (Possession of Firearms and Ammunition by a Prohibited Person -Felon), 18 U.S.C. § 924 (c) (Possession of Firearms in Furtherance of a Drug Trafficking Crime, and 21 U.S.C § 841(a)(1), (b)(1)(D) (Possession with Intent to Distribute a Controlled Substance)(Marihuana).

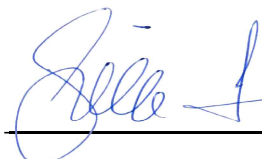
I hereby declare, under penalty of perjury, that the information contained in this Affidavit is known to be true and correct to best of my knowledge.

  
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Cyril X. Pereira  
Special Agent

Bureau of Alcohol, Tobacco, Firearms and Explosives

Subscribed and sworn before me by telephone pursuant to FRCP 4.1 at 11:08 a.m., this

\_\_\_\_ 26<sup>th</sup> day of February 2025.

  
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Hon. Giselle López Soler



**Hon. Giselle  
López-Soler**

Hon. Giselle López Soler

United States Magistrate Judge

District of Puerto Rico